

STATE OF INDIANA ) IN THE LAKE SUPERIOR COURT  
 ) SS:  
COUNTY OF LAKE ) SITTING IN LAKE COUNTY, INDIANA

DENISE RENEHAN and JOHN )  
RENEHAN, )  
Plaintiff, )  
)  
Vs. ) CAUSE NO.  
)  
MENARD, INC., D/B/S MENARDS, )  
and, TEAM MENARD, INC., D/B/A )  
MENARDS, )  
Defendant. )

**COMPLAINT AND JURY DEMAND**

COMES NOW Plaintiff, Denise Renahan, by counsel, Kenneth B. Elwood and Nathaniel C. Henson, Rhame, Elwood & McClure, PC, and for her cause of action against Defendant, Menards:

1. Plaintiff, Denise Renahan, at all times relevant herein, was a resident of Hobart, Lake County, Indiana.
2. Defendant, Menard, Inc., at all times relevant herein, was a foreign-for-profit corporation, with its principal place of business located at 5101 Menard Drive, Eau Claire, WI 54703. Defendant, Team Menard, Inc., at all times relevant herein, was a domestic-for-profit corporation, with its principal place of business located at 5101 Menard Drive, Eau Claire, WI 54703. Defendants, Menard, Inc., and Team Menard, Inc., are hereinafter collectively referred to as "Menards".
3. Defendants, Menards, own and operate a Menards retail store located at 6300 Mississippi Street, Merrillville, Lake County, Indiana.
4. On or about February 3, 2019, Plaintiff, Denise Renahan, was a customer of Defendant's, Menards store located at 6300 Mississippi Street, Merrillville, Indiana.

5. Defendant, Menards, owes a duty of care to its customers.

6. Defendant, Menards breached its duty of care by failing to adequately inspect the premises located at 6300 Mississippi Street, Merrillville, Lake County, Indiana, for hidden dangers.

7. Defendant, Menards, breached its duty of care by negligently maintaining the premises located at 6300 Mississippi Street, Merrillville, Lake County, Indiana, in an unsafe condition.

8. Defendant, Menards, breached its duty of care by failing inspect the premises and failing to warn Plaintiff, Denise Renehan, of the unsafe condition on the premises located at 6300 Mississippi Street, Merrillville, Lake County, Indiana.

9. As a direct and proximate result of Defendant, Menards, negligence, Plaintiff, Denise Renehan slipped and fell at the premises located at 6300 Mississippi Street, Merrillville, Lake County, Indiana; *to wit*: Plaintiff, Denise Renehan, slipped and fell on material and/or merchandize that had accumulated and been left on the floor causing a dangerous condition.

10. Defendant, Menards, in exercising reasonable care should have been aware of the dangerous condition of the floor located at 6300 Mississippi Street, Merrillville, Indiana.

11. As a direct and proximate result of the injuries caused to Plaintiff, Denise Renehan by the Defendant, Menards. Plaintiff and spouse, John Renehan, have suffered and will suffer loss of consortium which includes material services, conjugal relationships, companionship, aid, fellowship, company, cooperation, comfort, love, care, and affection.

12. As a direct result of Defendant, Menards, negligence, Plaintiff, Denise Renehan, has suffered and will suffer great bodily injury, pain, suffering, permanent impairment, and has incurred and will continue to incur expenses for medical treatment, as well as other expenses and damages.

13. Plaintiff, Denise Renehan requests damages in a reasonable sum to compensate her.

**WHEREFORE**, Plaintiff, Denise Renehan, by counsel, Kenneth B. Elwood and Nathaniel C. Henson, Rhame, Elwood & McClure, PC, prays for judgment against Defendant, Menards, in an amount sufficient to adequately compensate her and for all other just and proper relief in the premises of this Complaint together with costs and disbursements herein.

*/s/ Kenneth B. Elwood*

---

Kenneth B. Elwood, #17937-45  
Nathaniel C. Henson, #27429-64  
Rhame, Elwood & McClure, PC  
3200 Willowcreek Road, Suite A  
Portage, Indiana 46383  
Telephone: (219) 762-0904  
[kenelwood@rhameandelwood.com](mailto:kenelwood@rhameandelwood.com)  
[nhenson@rhameandelwood.com](mailto:nhenson@rhameandelwood.com)

**JURY DEMAND**

**COMES NOW** Plaintiff, Denise Renehan, by counsel, Kenneth B. Elwood and Nathaniel C. Henson, Rhame, Elwood & McClure, PC, and demands trial by jury on all issues.

*/s/ Kenneth B. Elwood*

---

Kenneth B. Elwood, #17937-45  
Nathaniel C. Henson, #27429-64  
Rhame, Elwood & McClure, PC  
3200 Willowcreek Road, Suite A  
Portage, Indiana 46383  
Telephone: (219) 762-0904  
[kenelwood@rhameandelwood.com](mailto:kenelwood@rhameandelwood.com)  
[nhenson@rhameandelwood.com](mailto:nhenson@rhameandelwood.com)